

EXHIBIT 1

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September 23, 2020

WRITER'S DIRECT NUMBER:
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Via Email

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Re: David Boies v. Alan Dershowitz
Supreme Court of New York, County of New York
Case No. 160874/2019 (the "State Action");

Virginia L. Giuffre v. Alan Dershowitz
U.S. District Court, Southern District of New York
Case No. 19-cv-3377 (Preska, J.) (the "Federal Action")

Dear Christian:

We are in receipt of the deposition notices for October 22, 2020, which is one of the conditional dates for Mr. Zeiger's deposition in the State and Federal actions. Based upon Defendant's filing today seeking to disqualify counsel for the Plaintiff, is this a realistic date? While we would like to conclude our involvement in this litigation as soon as possible, we have little desire to book and hold a date if the parties do not intend proceed on the scheduled date.

Separately, we previously noted that Mr. Zeiger's availability is subject to resolution of the outstanding issues (as more fully described in our letter of September 3, 2020, a copy of which is enclosed). We would appreciate receiving an update on the progress the parties have made in resolving those issues, as well as those set forth in Attorney Moss' related emails. It would seem that by this juncture we would have had an opportunity to review a draft protective order for the State Action. Certainly the protective order in the Federal Action could serve as a template for that order.

Our hope is that these outstanding issues can be resolved in the short term. Although not our preference, if you believe it necessary for us to assist in facilitating the parties' discussions, please advise.

Very truly yours,


Marion H. Little, Jr.

ZEIGER, TIGGES & LITTLE LLP

Christian Kiely, Esq.
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Enclosure

cc: Guy Petrillo, Esq. (via email)
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